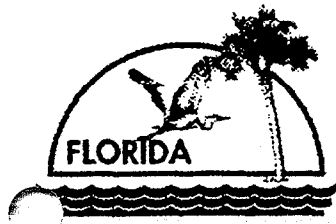


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LETTER REGARDING REGULATORY REVIEW AND NONCONCURRENCE WITH
CONCLUSIONS ON SITE SCREENING REPORT FOR STUDY AREA 54 NTC ORLANDO FL
1/15/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

09.01.54.0001

00359

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Kirby B. Green, III
Secretary

January 15, 1999

Mr. Wayne Hansel
Code 18B7
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: BRAC Environmental Site Screening Report, Study Area 54,
McCoy Annex, Naval Training Center, Orlando, FL

Dear Mr. Hansel:

I have completed my review of the BRAC Environmental Site Screening Report for Study Areas 54 (SA 54), McCoy Annex, dated December 2, 1998 (received December 3, 1998), prepared and submitted by Harding Lawson Associates. Based upon the information provided in the report, the Department cannot concur with the recommendation that SA 54 be reclassified from 7/Gray to 1/White and be made available for transfer. Concentrations of polynuclear aromatic hydrocarbons (PAHs) in surface and subsurface soils at the two broad areas investigated exceed the Department's industrial soil cleanup target levels (SCTLs).

The report specifies that there is nothing in the historical record to suggest that past site use has contributed to the release of PAH compounds. Based upon the historical record and analysis of aerial photographs, two locations were picked from two undisturbed areas for background sampling as part of the Background Sampling Report at Naval Training Center Orlando. Because these samples contained PAHs at levels above screening concentrations, the areas were made into SA 54.

Harding Lawson hypothesizes in the report that the PAHs are present due to either forest fires known to have occurred in adjacent areas during the 1970's or to controlled burning that may have taken place to mitigate the potential for fires during drought conditions. However, no supporting evidence for either of these past scenarios is presented in the report. Also, the Pinecastle Aero Club, consisting of an airstrip, an aircraft hanger and several other buildings, was located in the vicinity of the two areas comprising SA 54.

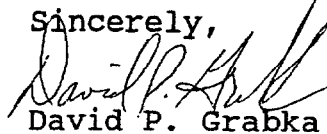
Conclusive evidence must be provided to verify that the PAHs detected were the result of forest fires or controlled burning

Mr. Wayne Hansel
January 15, 1999
Study Areas 54
Page 2

activities. Sources, whether through personnel interviews, facility documents or newspaper reports, should be found to confirm that areas where high levels of PAHs were detected correlate to areas of known forest fires or controlled burning. Even so, because the high levels of PAHs in surface and subsurface soils pose a risk, it may be necessary for institutional controls to be employed to restrict site access.

If I can be of any further assistance with this matter, please contact me at (850)488-3693.

Sincerely,



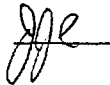
David P. Grabka
Remedial Project Manager

cc: Lt. Gary Whipple, NTC Orlando
Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, Brown & Root, Oak Ridge
Robert Cohose, Bechtel, Knoxville
Bill Bostwick, FDEP Central District

TJB



JJC



ESN

